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* Associated Firm

** In cooperation with
Trench, Rossi e Watanabe
Advogados

July 29, 2016

Mr. Tom Turner
Assistant Regional Counsel
United States Environmental Protection Agency, Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Old American Zinc Plant (OAZ) Superfund Site (Fairmont City, St. Clair County, Illinois) - Final Remedial Design under CERCLA Section 104/106/107/122 Administrative Settlement Agreement and Order on Consent (ASAO) #V-W-14-C-011 for Remedial Design (RD) - Formal Notice of Respondent Noncompliance

Dear Tom,

As we discussed by phone last week, Gold Fields Mining LLC ("Gold Fields") is in receipt of the letter from Sheila Desai, U.S. EPA's Remedial Project Manager, to Jennifer Mumper, dated July 8, 2016, purporting to serve as notice to Blue Tee Corp. ("Blue Tee"), the designated Respondent under the above-referenced 2014 Administrative Settlement Agreement and Order on Consent ("ASAO"), of alleged noncompliance with certain provisions of the ASAO at the Old American Zinc Plan Superfund Site in Fairmont City, Illinois.

As you know, Blue Tee, which is the legal successor to the American Zinc Company, entered into the ASAO with the U.S. EPA for the completion of response actions at the Fairmont City Site. To the extent Gold Fields has previously been involved in response actions at the Fairmont City Site, this work has been undertaken pursuant to third party contracts between Gold Fields and Blue Tee. Importantly, Gold Fields is not a signatory to the ASAO and did not at any time either own or conduct any operations at the Site. Gold Fields' only connection to the Fairmont City Site is the Company's third party contract with Blue Tee.

By letter dated June 9, 2016, Gold Fields notified Ms. Desai of the filing of its bankruptcy case and the fact that the Company is now subject to the jurisdiction of the U.S. Bankruptcy Court for the Eastern District of Missouri. Blue Tee was provided prompt notice of the filing of the Gold Fields' bankruptcy case, as well. Any legal obligations Gold Fields may have under contracts with Blue Tee will be resolved in the Gold Fields' bankruptcy case. At present, however, Gold Fields is precluded from performing any additional response actions at the Fairmont City Site and has no authority

to respond to the U.S. EPA with respect to the rights and obligations of Blue Tee as Respondent under its 2014 ASAOC with the Agency.

Gold Fields understands that Blue Tee may be represented by Kathleen Whitby of Spencer Fane in St. Louis, Missouri. We are also aware of the fact that Blue Tee has received a copy of the U.S. EPA's July 8th correspondence and suggest that you contact Ms. Whitby for additional direction from Blue Tee with respect to the above-referenced Notice of Respondent Noncompliance. Of course, please feel free to contact me if you have any questions or would like my assistance with respect to this matter.

Yours sincerely,



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Partner

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Cc: Chris Wittenauer
Jennifer Mumper
Kathleen Whitby